

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DEFENSE DISTRIBUTED,	§	
	§	
Plaintiff	§	
	§	
v.	§	No. 1:25-cv-01095-ADA-ML
	§	
YOUTUBE LLC, GOOGLE LLC,	§	
ALPHABET, INC.	§	
	§	
Defendants	§	

CORRECTED JOINT MOTION TO EXTEND DEADLINES

TO THE HONORABLE JUDGE:

Plaintiff Defense Distributed (“Plaintiff”) and Defendants YouTube LLC, Google, LLC and Alphabet, Inc. (“Defendants”) (Plaintiff and Defendants together, the “Parties”) file this Corrected Joint Motion to Extend Deadlines and respectfully show the Court as follows.

I. Need for Corrected Filing

On August 12, 2025, the parties filed their Joint Motion to Extend Deadlines (“Joint Motion”) along with a proposed order granting same. (Dkt. 29.) On August 18, 2025, the Court granted the Joint Motion via Text Order and entered the proposed order. (Dkt. 30.)

Counsel have just realized that the table in the Joint Motion and original proposed order did not reflect the final agreed-upon proposed deadlines for responses and replies to the pending motions to remand and to transfer. Accordingly, the Parties jointly submit this Corrected Joint Motion to Extend Deadlines and respectfully request that the Court enter the new proposed order.

II. Corrected Joint Motion to Extend Deadlines

Defendants removed this case on July 14, 2025. (Dkt. 1.) The same day, Defendants filed an Unopposed Motion for Extension of Time to Move, Answer, or Otherwise Respond to

Complaint seeking extension of the referenced deadline to August 20, 2025. (Dkt. 4.) The Court granted this extension by Text Order dated July 17, 2025. On July 17, the Court referred the case to Magistrate Judge Lane. (Dkt. 8; Dkt. Text dated July 16, 2025.) On July 18, the Court issued a Docket Control Order ordering the parties to confer and to file a joint proposed scheduling and discovery plan and a scheduling order (together, “Rule 26(f) Report”) by September 12, 2025. (Dkt. 9.)

On August 7, 2025, Plaintiff filed a Motion to Remand. (Dkt. 25.) On August 8, Defendants filed a Motion to Transfer to the Northern District of California (“Motion to Transfer”). (Dkt. 26.) Under Local Rule CV-7(D)(2), Responses to these motions are due on August 21 and August 22, respectively. Under Local Rule CV-7(E)(2), Replies are due on August 28 and August 29, respectively.

The Parties have conferred and jointly request that the Court extend certain of the aforementioned deadlines as follows:

Deadline	Original	Proposed Date
Response to Motion to Remand	August 21, 2025	September 5, 2025
Response to Motion to Transfer Venue	August 22, 2025	September 5, 2025
Reply in Support of Motion to Remand	August 28, 2025	September 19, 2025
Reply in Support of Motion to Transfer Venue	August 29, 2025	September 19, 2025

Additionally, the Parties jointly request that if the Court desires a hearing on the Motion to Remand and Motion to Transfer, that both such motions be heard at the same hearing.

Finally, the Parties jointly request that the deadlines for Defendants to answer or otherwise respond to the petition and for the Parties to file the Rule 26(f) Report (and any associated discovery deadlines) be stayed pending rulings on the Motion to Remand and Motion to Transfer and that new such deadlines be set for thirty (30) days after the Court has issued rulings on both such motions.

The Parties make this joint motion in good faith and not for purposes of undue delay, but to provide time to adequately brief the pending motions and to conserve and efficiently manage the Parties' and Court's resources. As set forth in the Certificate of Conference below, this is a joint request. The extensions will not impact any other case deadlines.

Dated: August 19, 2025

Respectfully submitted,

SCOTT DOUGLASS & MCCONNICO LLP

/s/ Steven J. Wingard

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CERTIFICATE OF CONFERENCE

The undersigned certifies that Defendants' counsel conferred with Plaintiff's counsel prior to filing the foregoing Corrected Joint Motion to Extend Deadlines. Counsel for all Parties agreed to jointly seek the requested relief.

/s/ Steve Wingard
Steve Wingard

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on August 19, 2025, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Steve Wingard
Steve Wingard